

**SNMP RESEARCH, INC. and SNMP  
RESEARCH INTERNATIONAL, INC.,**

**V.**

**Broadcom Inc.**  
**Brocade Communications Systems LLC**  
**Extreme Networks, Inc.**

## Defendants.

## Jury Trial Demanded

Comes now the Plaintiffs, SNMP Research, Inc. (“SNMP Research”) and SNMP Research International, Inc. (“SNMP International”), by and through counsel, and pursuant to Fed. R. Civ. P. 5.2 and Local Rule 26.2(b) of this Court, move for leave to file the following documents under seal based upon the parties’ prior agreement that the terms of the license agreement at issue in this cause would be maintained as confidential:

- Exhibit [A] to the Complaint [Doc. 1] filed in this matter; and
- An unredacted copy of the Complaint.

Plaintiffs filed their Complaint in this matter alleging breach of contract and copyright violations on October 26, 2020. Exhibit [A] to the Complaint is the license agreement between Plaintiff SNMP International and Defendant Brocade Communications Systems, Inc., now known as Brocade Communication Systems LLC. The parties agreed at the time they entered into the license agreement that the license agreement and the provisions thereof would be treated as confidential. Based upon the parties' agreement to keep the license agreement and its provisions confidential, Plaintiffs have redacted portions

of the Complaint which contain direct quotations from the license agreement. Pursuant to Local Rule 26.2, and to abide by the terms of the license agreement and keep it confidential, Plaintiffs seek to submit the license agreement, Exhibit [A], under seal. Pursuant to Fed. R. Civ. P. 5.2(f), Plaintiffs also seek leave of Court to submit an unredacted copy of the Complaint under seal.

**Respectfully submitted this 26th day of October, 2020.**

/s/ Cheryl G Rice

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*\*Motion for Admission Pro Hac Vice  
Forthcoming*

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